

EXHIBIT 1



Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
United States of America

T: +1 312 782 0600
F: +1 312 701 7711

mayerbrown.com

Daniel K. Storino
Partner

T: +1 312 701 7686
F: +1 312 706 8627
DStorino@mayerbrown.com

August 13, 2021

BY EMAIL

Leonid Feller
Quinn Emanuel Urquhart & Sullivan, LLP
191 N. Wacker Drive, Suite 2700
Chicago, Illinois 60606

**Re: In re Delta Dental Antitrust Litigation –
Plaintiffs’ Proposed Custodians and Search
Terms**

Dear Lenny:

I write on behalf of Defendants regarding Plaintiffs’ proposed custodians and search terms. On June 25, 2021, Plaintiffs provided a partial list of proposed custodians and non-custodial data sources. Plaintiffs did not, at that time, identify custodians for Plaintiffs Steven Dultz or Rittenhouse Smiles. On July 2, Plaintiffs provided a supplemental custodian list and a list of proposed search terms for all of the Named Plaintiffs. Unfortunately, both lists are materially deficient. We address each below.

I. Plaintiffs’ Proposed Custodians

As an initial matter, despite our request for organizational and employee information, Plaintiffs have produced only one organizational chart for Plaintiff Simon & Simon, and even then for only one year of the relevant time period. Plaintiffs have not provided *any* other identifying information regarding the employees, managers, or potential sources of documents/data for any of the other Named Plaintiffs.

Even with the limited information Plaintiffs have provided to date, it is clear that Plaintiffs’ proposed custodian list is lacking. Plaintiffs have failed to include all of the individuals that they previously identified in their Rule 26(a) disclosures as having information relevant to the claims and defenses in this litigation. Those individuals should be custodians.¹

¹ Plaintiffs’ one-sided approach is not well-taken. Defendants included all of the individuals from their own Rule 26(a) disclosures in their custodian lists. Undeterred, Plaintiffs have requested significantly expanding the number of Defendant custodians (sometimes exponentially).

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Below is a chart identifying for each Named Plaintiff (1) the custodians and non-custodial data sources that Plaintiffs have offered and (2) the additional custodians from Plaintiffs' Rule 26(a) disclosures that should be added:

Plaintiff	Offered Custodian	Additional Custodian
B. Kyle Benton	Brandon K. Benton Staff1@bentonfamilydentistry.com Staff2@bentonfamilydentistry.com	Vanessa Petty
Robert S. Dolgow	Robert Dolgow Smilebrighteners@aol.com	Renea R. Wenkstern
Steven P. Dultz	Plaintiffs stated: "Plaintiffs' counsel will not be searching by custodian. Dr. Steven Dultz retired in 2016 and we will be reviewing all electronic and hard copy documents that are in his possession, custody, or control."	Dana Caruso Katerina Kouvatso Arleen Schnitzer Mina VanDerveer Annette Bernstein
Kaufman & Kaufman Smile Design Studio LLC	Louis Kaufman Wendy Goldwater office@chicagodenistry.com	Sue Stephens Mary Beth Frampton Bajonas Lisa Minkowski Dennis Gan Brian Carlson
Legacy Dental Associates P.C.	William Osborne info@legacyranchdental.com	Lyndsay Jarrell Jesus Alvarado Catherine Jensen
Rick Lindley	smilemaker@verizon.net smiletemecula@gmail.com	Rick Lindley Linette Lindley Kelsey Ginter
Rittenhouse Smiles, P.C.	Andrea Cronin Shalu Markus	Salome Zangaladze Jillian Fitzgerald Shauneice Woods Janann Ewing Reuben Kamp
Simon and Simon, P.C.	William A. Simon Adriana Manning Diana Sotelo Leila Santos Sandra Rios	N/A

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Plaintiff	Offered Custodian	Additional Custodian
Tooth Town Pediatric Dentistry, PLLC	Stephen Ghezzi Elisa Ghezzi admin@toothtownsmiles.com billing@toothtownsmiles.com	Sarah Mazzocco
Mary M. Fisher	Mary Fisher Andrea Hislop Danielle LaBarre Katie LaBarre licensing@drmarymfisher.com office@drmarymfisher.com	N/A
Bemus Point Dental, LLC	Tracy Culver Kathy Haight	N/A
Timothy C. Verharen	Timothy C. Verharen Scarlett Kelly billing@currentdental.com frontoffice@currentdental.com	Alexis Engelgau Diana Brink

The deficiencies in Plaintiffs’ offer are best evidenced by the proposed production for Plaintiff Steven Dultz—a dentist who apparently retired in 2016. In their Rule 26(a) disclosure for Dr. Dultz, Plaintiffs identified six individuals with information relevant to the claims and defenses in the lawsuit. Instead of including those individuals as custodians, Plaintiffs have proposed searching only Dr. Dultz’s current files for responsive documents—which, given the passage of time since his retirement, is likely a null set. That, on its face, is unacceptable.

The lack of information provided by Plaintiffs has made it virtually impossible for Defendants to evaluate the adequacy of Plaintiffs’ proposed custodians. Defendants therefore reserve their right to seek additional custodians, beyond those identified above, upon our review of the documents produced in this litigation, including those produced by Plaintiffs.

II. Plaintiffs’ Proposed Search Terms

Plaintiffs’ proposal on search terms is also deficient. Plaintiffs have omitted obviously relevant terms, such as the names of dental insurance carriers, the names of government dental programs, the names of dental service organizations, and the names of common dental procedures. Further, Plaintiffs have proposed direct collections—*i.e.*, collections from non-custodial, central files or sources—for only a handful of document requests. As indicated in our counterproposal (attached as Exhibit A), there are a number of additional requests for production where direct collections (or a combination of direct collections and custodial searches) would be appropriate.

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We look forward to your response.

Sincerely,

Daniel K. Storino

EXHIBIT A

In Re: Delta Dental Antitrust Litigation, No. 19-cv-06734 (N.D. Ill.)

PLAINTIFFS' PROPOSED SEARCH TERMS

No Search Terms: Plaintiffs' Counsel will directly collect and review certain categories of documents that are responsive to certain of Defendants' requests for production without the use of search terms. Specifically, RFP Nos.: 1, 2, 21, 22, 45, 47, 52, 63, 64.

Further, with respect to RFP No. 61, Plaintiffs' Counsel will review Plaintiffs' social media posts in addition to running search terms for any documents "related" to any discussion Plaintiffs participated in on social media message boards. The proposed search terms are included in the list below.

DEFENDANTS' RESPONSE

There are additional requests for production that should be addressed through direct collections—*i.e.*, responsive documents identified from non-custodial, centralized searches that are not collected solely through the use of search terms. Defendants believe that documents responsive to the following requests can be located through non-custodial collections (or alternatively through a combination of search terms and non-custodial collections):

- RFP No. 3: Contracts, including modifications, amendments, and attachments, with Defendants and communications regarding such contracts and related materials;
- RFP No. 4: Contracts, including modifications, amendments, and attachments, with other Dental Benefits Carriers or Government Programs and communications regarding such contracts and related materials;
- RFP No. 8: Plaintiffs' chargemasters and accepted fee schedules;
- RFP No. 9: Documents sufficient to show the Provider Networks that Plaintiffs participate in and other forms of payment that Plaintiffs accept;
- RFP No. 10: Documents sufficient to show reimbursement rates accepted (e.g., fee schedules for Dental Benefits Carriers, In-Office Dental Plans, etc.);
- RFP No. 16: Documents sufficient to show the In-Office Dental Plans or Patient Self-Financing Plans that Plaintiffs accept;
- RFP No. 17: Contracts, including modifications, amendments, and attachments, with patients regarding payment or financing arrangements;
- RFP No. 18: Standard documents, policies, or disclosures that Plaintiffs provide to patients concerning payment, dental benefits, or financing;
- RFP No. 24: Settlement agreements, release of claims, and any other documentation of resolution of payment disputes with Dental Benefits Carriers or other payers;
- RFP No. 27: Copies of advertisements or marketing/promotional materials;
- RFP No. 28: Documents reflecting participation in Leased Networks;
- RFP No. 29: Documentation of disciplinary actions;

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- RFP No. 32: Contracts, including modifications, amendments, and attachments, with Dental Service Organizations (“DSOs”);
- RFP No. 37: Data and reports on dental quality for Plaintiffs’ dental practices;
- RFP No. 38: Sales strategies, forecasts, and sales plans;
- RFP No. 46: Recruitment of dental providers;
- RFP Nos. 49, 50, and 51: Costs of dental practice, capital expenditures, and dental practice valuations;
- RFP No. 53: Financial support applications from any source, as well as documentation of any relief or support received;
- RFP No. 55: Contracts with consultants regarding dental practice;
- RFP No. 56: Articles of incorporation, bylaws, and organizational documents;
- RFP No. 62: Copies of speeches, articles, presentations, etc.

Search Terms: Plaintiffs’ Counsel will use the following the search terms:

- (Contract* or agree* or participat* or accept* or commit* or “take part” or join* or enroll* or enlist* or enter or use* or utiliz* or “work with” or negotiat* or execut* or finaliz* or sign*) w/515 (Delta* or DD*) “Delta Dental”
- (Contract* or agree* or participat* or accept* or commit* or “take part” or join* or enroll* or enlist* or enter or use* or utiliz* or “work with” or negotiat* or execut* or finaliz* or sign*) w/30 (carrier OR insurer OR insurance or network or PPO or Premier OR plan or group or individual or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant)
- (contract* or agree* or participat* or accept* or commit* or “take part” or join* or enroll* or enlist* or enter or use* or utiliz* or “work with” or negotiat* or execut* or finaliz* or sign*) w/1540 (state OR gov* or agency or Medicare or Medicaid or Obamacare or ACA or “Affordable Care Act” or Alaska* or Hawai* or Washington or Oregon or California or Idaho or Nevada or Arizona or Utah or Wyoming or Montana or Dakota or Nebraska or Kansas or Oklahoma or Texas or Louisiana or Arkansas or Missouri or Iowa or Minnesota or Wisconsin or Illinois or Kentucky or Tennessee or Mississippi or Alabama or Georgia or Florida or Carolina or Virginia or Ohio or Indiana or Michigan or Maryland or Delaware or Pennsylvania or “New Jersey” or “New York” or Connecticut or “Rhode Island” or Massachusetts or Vermont or “New Hampshire” or Maine or “Puerto Rico”)
- dental w/5 (carrier OR insurer OR insurance OR PPO OR Premier OR plan or group or individual or payor)

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- ~~dental w/5 (carrier OR insurer)~~ [Duplicative of search above]
- (patients OR individuals) w/20 enroll~~ed~~ w/20 (carrier OR plan OR insurer OR insurance OR PPO OR Premier OR group OR individual)
- (code or coding or coded or codes OR price or pricing or priced or prices or charge or charged or charging OR discount or discounted or discounting OR write-down or “written down” or write-downs or write-off or written-off or wrote-off) w/30 (good OR service OR procedure OR care OR surgery OR emergency OR treatment OR “oral evaluation” OR intraoral OR bitewing* OR maxillofacial* OR prophylaxis* OR amalgam* OR removal* OR “resin-based” OR crown* OR endontic* OR scaling*)
- (participate* OR utilize* OR sign-up OR (sign* w/2 up) OR use*) w/10 (network OR carrier OR insurer OR insurance OR PPO OR Premier OR plan OR Delta* OR DD* OR “Blue Cross” OR “Blue Shield” OR BCBS OR Anthem OR Wellpoint OR MetLife OR “Met Life” OR Aetna OR Cigna OR United OR UCCI OR UHC OR Humana OR Principal OR PFG OR Dearborn OR Guardian OR Ameritas OR Assurant);
- payment w/10 (good OR service OR procedure OR care OR surgery OR emergency OR treatment OR “oral evaluation” OR intraoral OR bitewing* OR maxillofacial* OR prophylaxis* OR amalgam* OR removal* OR “resin-based” OR crown* OR endontic* OR scaling*)
- reimburs* w/20 (good OR service OR procedure OR treatment OR care OR oral evaluation” OR intraoral OR bitewing* OR maxillofacial* OR prophylaxis* OR amalgam* OR removal* OR “resin-based” OR crown* OR endontic* OR scaling*)
- ÷ “fee schedule”
- (reimburs* OR EOB OR “explanation of benefits” OR rate OR “claim request” OR appeal OR grievance OR objection OR complain* OR disput* OR contest* OR process) w/30 (Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant)
- (analy* or consider* or evaluat* OR stud~~y~~ OR compar* OR investigat* OR examin*) w/30 (insurance or reimburs* OR rate OR “fee schedule” OR network* OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant)

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- ~~contract w/30 (carrier OR insurer); contract w/10 (state or gov)~~ [Duplicative of search above.]
- (reimburs* OR premium OR discount OR premium OR deductible OR co-payment OR co-insurance OR terms) w/10 (gov* OR ADA OR association OR organization OR agency* OR Medicare OR Medicaid OR Obamacare OR ACA OR “Affordable Care Act” OR Alaska* OR Hawai* OR Washington OR Oregon OR California OR Idaho OR Nevada OR Arizona OR Utah OR Wyoming OR Montana OR Dakota OR Nebraska OR Kansas OR Oklahoma OR Texas OR Louisiana OR Arkansas OR Missouri OR Iowa OR Minnesota OR Wisconsin OR Illinois OR Kentucky OR Tennessee OR Mississippi OR Alabama OR Georgia OR Florida OR Carolina OR Virginia OR Ohio OR Indiana OR Michigan OR Maryland OR Delaware OR Pennsylvania OR “New Jersey” OR “New York” OR Connecticut OR “Rhode Island” OR Massachusetts OR Vermont OR “New Hampshire” OR Maine OR “Puerto Rico”)
- (Delta* w/20 (rate*s OR reimburs* OR pay*)) AND (gov* OR ADA OR association OR organization OR agency* OR Medicare OR Medicaid OR Obamacare OR ACA OR “Affordable Care Act” OR Alaska* OR Hawai* OR Washington OR Oregon OR California OR Idaho OR Nevada OR Arizona OR Utah OR Wyoming OR Montana OR Dakota OR Nebraska OR Kansas OR Oklahoma OR Texas OR Louisiana OR Arkansas OR Missouri OR Iowa OR Minnesota OR Wisconsin OR Illinois OR Kentucky OR Tennessee OR Mississippi OR Alabama OR Georgia OR Florida OR Carolina OR Virginia OR Ohio OR Indiana OR Michigan OR Maryland OR Delaware OR Pennsylvania OR “New Jersey” OR “New York” OR Connecticut OR “Rhode Island” OR Massachusetts OR Vermont OR “New Hampshire” OR Maine OR “Puerto Rico”)
- (~~(in_w/2 office)~~ dental w/2 (discount OR savings)) OR (self-financ*) OR ((self* OR customer* OR patient* OR subscrib*) w/2 (pay* OR financ*)) AND (plan OR program)
- (contract* OR agree* or participat* or accept* or commit* or “take part” or join* or enroll* or enlist* or enter or affiliate* or use* or utilize* or “work with”) w/10 patient w/10 (financ* OR payment or discount or savings);
- (claim OR dispute OR appeal) w/20 (carrier OR insurer OR insurance OR program OR plan OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant)
- (policy OR policies OR disclosure OR form) w/30 (payment or financ* or reimburs*)

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- ~~((in w/2 office) OR (self financ*)) AND (plan OR program) [Duplicative of search above.]~~
- ~~((in w/2 office) OR (self financ*)) AND (plan OR program) [Duplicative of search above.]~~
- ~~(claim OR dispute) w/20 (carrier OR program OR plan) [Duplicative of search above.]~~
- (statement OR summary OR annual OR benefit* OR “treatment plan” OR copay) AND (patient OR encounter)
- (market* OR promot*_OR advertisement or ad OR website OR brochure OR blog OR facebook OR google OR twitter OR Instagram OR “social media”) w/20 (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)
- ((Lease or leased or leasing or leases or rent* or wrap) w/10 network) OR “Connection Dental” OR “First Dental” OR Dentemax OR Careington OR “Premier Dental” OR Maverest OR Stratose OR Zelis
- “disciplinary action” (“disciplinary action” or disciplined OR penaliz* OR accus* OR disciplin* OR hearing OR disput* OR disagree* OR punish* OR violat* OR complian* OR comply* OR complain* OR litigat* OR arbitrat*) w/15 license
- (Delta* w/5 board*) w/30 (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)
- (compet* OR better OR worse OR same OR able OR ability OR qualit* OR share* OR monopol* OR (market w/3 (power or domina* or force)) OR vie OR contest or battle OR contend OR fight OR play*) OR scale OR leverag* w/20 (carrier OR insurer OR insurance OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant)
- (contract OR agree*_~~ment~~ OR participat* or accept* or commit* or “take part” or join* or enroll* or enlist* or enter or affiliate* or use* or utilize* or “work with” or negotiat*) w/100 (DSO OR “Dental Service Organization” OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great

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Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures” OR “Western Dental” OR InterDent)

- (service*~~s~~ OR treatment OR location OR name) w/300 (DSO OR “Dental Service Organization” OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures” OR “Western Dental” OR InterDent))
- (DSO OR “Dental Service Organization” OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures” OR “Western Dental” OR InterDent) w/20 (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin OR office OR practice))
- (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin OR office OR practice) w/50 (~~delta OR~~ carrier OR insurer OR insurance OR gov* OR agency OR Medicare OR Medicaid OR Obamacare OR ACA OR “Affordable Care Act” OR plan OR reimburs* OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant))
- (compet* OR Better OR worse OR same OR qualit* OR share* OR monopol* OR (market w/3 (power or domina* or force)) OR vie OR contest or battle OR contend OR fight OR play* OR scale OR leverag*) AND (carrier OR program OR plan OR ~~DSO~~ OR “Dental Service Organization” OR insurer OR insurance) OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures” OR “Western Dental” OR InterDent OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant);
- (operate OR profit OR loss OR continue) w/20 (carrier OR program OR plan OR DSO OR “Dental Service Organization” OR insurer OR insurance) OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures”

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OR “Western Dental” OR InterDent OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant (~~“insurance plan” OR carrier~~)

- (quality* OR assess*~~ment~~ OR analy*~~sis~~ OR survey OR report OR data OR review* OR audit*) w/10 (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)
- (~~strateg~~strateg*~~!~~ OR forecast* OR predict*) w/20 (profit* OR loss* OR performance OR compet* OR market* OR customer* OR practice* OR office OR patient* OR procedur* OR grow* OR contract* OR expan* OR invest* OR divest* OR sell* OR purchas* OR equit* OR return*) (~~Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin~~)
- (relation*~~ship~~ OR connect*~~ion~~ OR impact or effect OR affect OR correlat*) AND ((reimburs* OR pay* OR rate) w/20 premium)
- (association OR organization OR institution* OR group* OR club* OR consortium* OR cooperative* OR society* OR partnership*) w/10 (((Steven OR Steve OR Dr) w/ 2 Dultz) OR ((Mary OR Dr) w/2 Fisher) OR ((Stephen OR Steve OR Elisa Or Dr or Drs) w/2 Ghezzi) OR ((William OR Will Or Bill OR Dr) w/2 Simon) OR ((Rick OR Richard OR Dr) w/2 Lindley) OR ((Louis Or Lou OR Dr) w/2 Kaufman) OR ((Tracy OR Dr) w/ Culver) OR ((Kyle OR Dr) w/2 Benton) OR ((Robert OR Rob OR Bob OR Dr) w/2 Dolgow) OR ((William OR Will OR Jeffrey OR Jeff OR Dr) w/2 Osborne) OR ((Timothy OR Tim Or Dr) w/2 Verharen)OR ((Andrea or Dr) w/2 Cronin))
- (carrier OR insurer OR insurance OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant) AND (~~Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin~~) w/10 (“out of state” OR “out-of-state” or non-resident OR (not w/3 resident) OR (non w/3 resident) OR (out w/3 (state OR area) OR (out* w/3 (Alaska* Or Hawai* OR Washington OR Oregon OR California OR Idaho OR Nevada OR Arizona OR Utah OR Wyoming OR Montana OR Dakota OR Nebraska OR Kansas OR

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Oklahoma OR Texas OR Louisiana OR Arkansas OR Missouri OR Iowa OR Minnesota OR Wisconsin OR Illinois OR Kentucky OR Tennessee OR Mississippi OR Alabama OR Georgia OR Florida OR Carolina OR Virginia OR Ohio OR Indiana OR Michigan OR Maryland OR Delaware OR Pennsylvania OR “New Jersey” OR “New York” OR Connecticut OR “Rhode Island” OR Massachusetts OR Vermont OR “New Hampshire” OR Maine OR “Puerto Rico”))

- (treatment OR service* OR procedure OR care OR surgery OR emergency OR “oral evaluation” OR intraoral OR bitewing* OR maxillofacial* OR prophylaxis* OR amalgam* OR removal* OR “resin-based” OR crown* OR endontic* OR scaling*) AND (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin) w/10 (“out of state” OR “out-of-state” or non-resident OR (not w/3 resident) OR (non w/3 resident) OR (out w/3 (state OR area) OR (out* w/3 (Alaska* OR Hawai* OR Washington OR Oregon OR California OR Idaho OR Nevada OR Arizona OR Utah OR Wyoming OR Montana OR Dakota OR Nebraska OR Kansas OR Oklahoma OR Texas OR Louisiana OR Arkansas OR Missouri OR Iowa OR Minnesota OR Wisconsin OR Illinois OR Kentucky OR Tennessee OR Mississippi OR Alabama OR Georgia OR Florida OR Carolina OR Virginia OR Ohio OR Indiana OR Michigan OR Maryland OR Delaware OR Pennsylvania OR “New Jersey” OR “New York” OR Connecticut OR “Rhode Island” OR Massachusetts OR Vermont OR “New Hampshire” OR Maine OR “Puerto Rico”)) w/10 (“out of state” OR “out of state” or (out w/5 (state or [state that plaintiff is located]) non-resident) w/10 (patient w/5 (“out of state” OR “out of state” OR non-resident))
- (recruit*~~ment~~ OR hiring OR hire*) w/20 (provider OR dentist OR dr. OR pedodontist OR orthodontist OR periodontist OR endodontist OR pathologist OR surgeon OR prosthodontist Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin) w/20 (harm* OR limit* OR restrict* OR confine* OR curb* OR ceiling* OR stop* OR cease* OR restrain* OR hinder* OR inhibit* OR impair* OR damage* OR hurt* OR undermin* OR hurt* OR decreas* OR curtail* OR diminish* OR drop* OR dwindle* OR deteriorat* OR diminish* OR lessen* OR reduc* OR slump* OR slash* OR shrink* OR wane* OR weaken*)
- (compensation OR salary* OR benefit* OR pay*s OR earning*) w/15 (harm* OR limit* OR restrict* OR confine* OR curb* OR ceiling* OR stop* OR cease* OR restrain* OR hinder* OR inhibit* OR impair* OR damage* OR hurt* OR undermin* OR hurt* OR

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decreas* OR curtail* OR diminish* OR drop* OR dwindle* OR deteriorat* OR diminish* OR lessen* OR reduc* OR slump* OR slash* OR shrink* OR wane* OR weaken* OR down* OR less* OR low*)

- ~~Of (income OR profit OR revenue OR cash OR earning* OR return* OR fund*) w/15 (business OR practice OR office OR dental OR dentist) w/10 (down OR loss OR less OR decreased OR low*) w/15 (harm* OR limit* OR restrict* OR confine* OR curb* OR ceiling* OR stop* OR cease* OR restrain* OR hinder* OR inhibit* OR impair* OR damage* OR hurt* OR undermin* OR hurt* OR decreas* OR curtail* OR diminish* OR drop* OR dwindle* OR deteriorat* OR diminish* OR lessen* OR reduc* OR slump* OR slash* OR shrink* OR wane* OR weaken* OR down* OR less* OR low*)~~
- (cost*s OR expense*s OR bills OR maintenance OR rent OR supplies OR training OR malpractice OR utilities) w/20 (practice or dental or dentist or office or business or partnership) ~~(Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)~~
- (invest*~~ment~~ OR capital OR machine OR device OR equipment OR improvement OR fund* OR lend* OR loan*) w/15 (practice or dental or dentist or office or business or partnership) w/10 ~~(Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)~~
- (valuation OR sale OR financ* OR equity OR sell or purchase or value or valued or offer or offered or buy OR apprais* OR worth*) w/20 (practice or dental or dentist or office or business or partnership) ~~Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cron~~
- (Loan OR lend* OR forgive* OR “paycheck protection” OR “tax return”) w/15 (practice or dental or dentist or office or business or partnership) w/10 ~~(Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)~~

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- (service*s OR technology OR equipment OR probe OR scaler OR ejector OR drill OR mold OR burnisher OR curette OR laser* OR camera* OR imaging* OR impression* OR loupe OR) w/15 (start* OR stop* OR begin* OR use* OR utiliz* OR adopt* OR employ* OR end* OR ceas* OR limit* OR restrict* OR confine* OR curb* OR ceiling* OR restrain* OR hinder* OR inhibit* OR impair* OR damage* OR hurt* OR undermin* OR hurt* OR decreas* OR curtail* OR diminish* OR drop* OR dwindle* OR deteriorat* OR diminish* OR lessen* OR reduc* OR slump* OR slash* OR shrink* OR wane* OR weaken* OR down* OR less* OR low*)w/10 (~~Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin~~)
- (consultant or expert or advisor or agent or outside or support) w/20 (practice or dental or dentist or office or business or partnership or profit* or revenue* or loss* or reimburse* or insurance* or network* or Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant)-(~~Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin~~)
- (“articles of incorporation” OR by-laws OR “operating agreement” OR bylaw OR “corporate structure” OR “business structure” or “govern* document*”) AND (Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)
[Defendants believe these documents can be collected through a direct collection as well.]
- (charit* OR foundation OR research*) AND (delta* OR DD*)
- (~~“billing* database”~~ OR reimburs* OR charge*s) w/20 (“.com” OR external OR outsource)
- (litigation OR “class action” OR lawsuit OR “law suit” OR antitrust OR sue or case) w/20 (Delta* OR DD*)
- (injur* OR hurt* OR harm* OR damage OR lose OR lost OR losing OR limit* OR restrict* OR confine* OR curb* OR restrain* OR hinder* OR inhibit* OR impair* OR undermin* OR hurt* OR decreas* OR curtail* OR diminish* OR deteriorat* OR

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diminish* OR less* OR reduc* OR slash* OR shrink* OR weaken*) w/10 (Delta* OR DD*)

- (dentaltown OR facebook OR twitter OR blog OR instagram OR “social media”) w/20 (practice OR dental OR dentist OR office OR business OR partnership OR plan* OR network* OR carrier* OR insurance* OR insurer* OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant OR DSO OR “Dental Service Organization” OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures” OR “Western Dental” OR InterDent) ~~(plan OR network OR delta OR carrier OR insurer)~~
- (speech OR speak* OR discuss* OR present*ation OR author OR record OR remark*) w/10 (practice OR dental OR dentist OR office OR business OR partnership OR plan* OR network* OR carrier* OR insurance* OR insurer* OR Delta* or DD* or “Blue Cross” or “Blue Shield” or BCBS or Anthem or Wellpoint or MetLife or “Met Life” or Aetna or Cigna or United or UCCI or UHC or Humana or Principal or PFG or Dearborn or Guardian or Ameritas or Assurant OR DSO OR “Dental Service Organization” OR Heartland OR Aspen OR PDS OR Pacific OR “Smile Brands” OR ADP OR “American Dental Partners” OR “Great Expressions” OR DCA OR “Dental Care Alliance” OR “Affordable Dentures” OR “Western Dental” OR InterDent) ~~(Dultz OR Fisher OR “Tooth Town” OR “Ghezzi” OR Simon OR “City Smiles” OR Lindley OR Kaufman OR “Smile Design” OR Osborne OR “Legacy Dental” OR Bemus OR Benton OR Dolgow OR “Smile Brighteners” OR Verharen OR Rittenhouse OR Cronin)~~